

**1** BRIAN J. STRETCH (CSBN 163973)  
Acting United States Attorney

**KYLE F. WALDINGER (ILSB 6238304)**  
Assistant United States Attorney

**4** 450 Golden Gate Avenue, 11th Floor  
San Francisco, California 94102  
**5** Telephone: (415) 436-6830  
Facsimile: (415) 436-7234

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, ) NO. CR 07-0337 MHP  
Plaintiff, )  
v. )  
JACQUELINE FROELICH-L'HEUREAUX, )  
Defendant. )  
) STIPULATION AND [PROPOSED] ORDER  
UNSEALING THE PLEA AGREEMENT

18 The United States of America, by and through its attorney Assistant United States  
19 Attorney Kyle F. Waldinger, and the defendant Jacqueline Froehlich-L'Heureaux, by and through  
20 her attorney Leland B. Altschuler, hereby stipulate and agree that the Plea Agreement in this  
21 matter may be unsealed. In further support of this request, the parties state as follows:

22       1. The defendant entered her plea of guilty in open Court on June 4, 2007. At that  
23 time, the Court ordered that the parties' Plea Agreement be filed under seal.

24       2. Since that time, the United States has obtained an Indictment charging the  
25 defendants David Nosal and Becky Christian with numerous offenses. That case is numbered  
26 CR 08-0237 MHP. Both Nosal and Christian have made their initial appearances before  
27 Magistrate Judge Larson, and Christian has made her initial appearance before this Court. Both  
28 defendants are scheduled to appear before this Court on May 19, 2008.

**STIPULATION AND [PROPOSED] ORDER  
CR 07-0337 MHP**

3. Both Nosal and Christian have requested Rule 16 discovery from the government. The government intends to produce in discovery the defendant Jacqueline Froehlich-L'Heureaux's Plea Agreement to the defendants Nosal and Christian. Before doing so, the United States seeks unseal that agreement.

4. Accordingly, for the reasons stated above, the parties stipulate and agree that the defendant Jacqueline Froehlich-L'Heureaux's Plea Agreement with the United States should be unsealed.

**SO STIPULATED.**

DATED: May 6, 2008

BRIAN J. STRETCH  
Acting United States Attorney

KYLE F. WALDINGER  
Assistant United States Attorney

DATED: May 5, 2008

/s/  
LELAND B. ALTSCHULER  
Attorney for defendant Jacqueline Froehlich-  
L'Heureaux

~~PROPOSED~~ ORDER

Good cause appearing therefor, it is hereby ordered that the plea agreement filed in this matter on or about June 4, 2007 is UNSEALED. \_\_\_\_\_

DATED: May 7, 2008



STIPULATION AND [PROPOSED] ORDER  
CR 07-0337 MHP